

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:21-CV-463-JRG
)	
SAMSUNG ELECTRONICS CO., LTD.,)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS AMERICA,)	
INC., SAMSUNG SEMICONDUCTOR,)	
INC.,)	
)	
Defendants.)	

**DECLARATION OF YANAN ZHAO IN SUPPORT OF NETLIST, INC.'S
MOTION TO COMPEL PRODUCTION OF DOCUMENTS BY DEFENDANTS
SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA,
INC., AND SAMSUNG SEMICONDUCTOR, INC.**

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion to Compel Production of Documents by Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., a Samsung Semiconductor, Inc. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct copy of an email exchange between counsel for Netlist and counsel for Samsung.

3. Attached as **Exhibit 2** is a true and correct excerpts of rough transcripts of the December 19, 2022 deposition of Mr. Sungho Choi in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 22, 2022, in Los Angeles, California.

By /s/ Yanan Zhao
Yanan Zhao